

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X
TERWIN ADVISORS LLC, and TERWIN	: No. 1:07-cv-3647-JGK
WAREHOUSE MANAGEMENT LLC, as Program	:
Administrator for and Assignee of TERWIN	: DECLARATION OF MATTHEW J.
MORTGAGE WAREHOUSE TRUST II, SERIES	: BORGER IN SUPPORT OF ENTRY
LVIII,	: OF JUDGMENT BY DEFAULT
	: AGAINST DEFENDANTS SILVER
Plaintiffs,	: STATE FINANCIAL SERVICES,
	: INC., MICHAEL STODDART
vs.	: <u>AND LYNN WOODRUM</u>
	:
SILVER STATE FINANCIAL SERVICES, INC.,	:
MICHAEL STODDART, and LYNN WOODRUM,	:
	:
Defendants.	:
-----	X

Matthew J. Borger, in support of plaintiffs Terwin Advisors LLC's ("Terwin Advisors") and Terwin Warehouse Management LLC's ("Terwin Warehouse") application for judgment by default hereby declares and says:

1. I am a member of the Bar of this Court and a partner with the firm of Klehr, Harrison, Harvey, Branzburg & Ellers LLP, attorneys for plaintiffs in the above-entitled action and I am familiar with all the facts and circumstances in this action.
2. I make this declaration pursuant to Rules 55.1 and 55.2(a) of the Civil Rules for the Southern District of New York, in support of plaintiffs' application for the entry of default judgment against defendants Silver State Financial Services, Inc. ("Silver State"), Michael Stoddart and Lynn Woodrum.
3. This is an action for breach of a contract in four counts. Count I is brought by Terwin Warehouse against Silver State for breach of the October 12, 2006 Terwin Warehouse Purchase Agreement. Count II is brought by Terwin Warehouse against Lynn Woodrum for breach of the October 12, 2006 Woodrum Guaranty. Count III is brought by Terwin Warehouse

against Craig Stoddart for breach of the October 12, 2006 Stoddart Guaranty. Count IV is brought by Terwin Advisors against Silver State for breach of the March 1, 2004 Terwin Advisors Purchase Agreement.

4. Jurisdiction over the subject matter of this action is based on 28 U.S.C. § 1332(a) in that the matter in controversy exceeds \$75,000 exclusive of interest and costs, and is between citizens of different states.

5. This action was commenced on May 8, 2007 by the filing of the summons and complaint. A copy of the summons and complaint was served on each defendant as follows:

a. A copy of the summons and complaint was served on defendant Silver State on May 27, 2007 by personal service on Carol the Silver State receptionist and the Affidavit of Service by the process server was filed on June 26, 2007 (Docket Entry No. 3). Defendant Silver State has not answered the complaint and the time for defendant Silver State to answer the complaint has expired. The Clerk's Certificate of Default by defendant Silver State was issued on July 6, 2007.

b. A copy of the summons and complaint was served on defendant Michael Stoddart on June 8, 2007 by serving Irma L. Gloria, Esquire, counsel to Mr. Stoddart, who was authorized to accept service of process and who did accept service of process on behalf of Mr. Stoddart by federal express overnight delivery. Proof of such service was filed on June 27, 2007 (Docket Entry No. 4). Defendant Michael Stoddart has not answered the complaint and the time for defendant Michael Stoddart to answer the complaint has expired. The Clerk's Certificate of Default by defendant Michael Stoddart was issued on July 6, 2007.

c. A copy of the summons and complaint was served on defendant Lynn Woodrum on June 8, 2007 by serving Irma L. Gloria, Esquire, counsel to Mr. Woodrum,

who was authorized to accept service of process and who did accept service of process on behalf of Mr. Woodrum by federal express overnight delivery. Proof of such service was filed on June 27, 2007 (Docket Entry No. 4). Defendant Lynn Woodrum has not answered the complaint and the time for defendant Lynn Woodrum to answer the complaint has expired. The Clerk's Certificate of Default by defendant Lynn Woodrum was issued on July 6, 2007.

6. This action seeks judgment against the defendants as follows:

a. Count I – Terwin Warehouse seeks judgment against Silver State for the liquidated amount of \$956,034.63, plus interest at 9% from February 15, 2007 amounting to \$34,180.85, plus attorneys' fees, costs and disbursements of this action in the amount of \$15,107.69 amounting in all to \$1,005,323.17 as shown by the annexed Statement of Damages, which is justly due and owing, and no part of which has been paid except as therein set forth.

b. Count II – Terwin Warehouse seeks judgment against Lynn Woodrum for the liquidated amount of \$956,034.63, plus interest at 9% from February 15, 2007 amounting to \$34,180.85, plus attorneys' fees, costs and disbursements of this action in the amount of \$15,107.69 amounting in all to \$1,005,323.17 as shown by the annexed Statement of Damages, which is justly due and owing, and no part of which has been paid except as therein set forth.

c. Count III – Terwin Warehouse seeks judgment against Michael Stoddart for the liquidated amount of \$956,034.63, plus interest at 9% from February 15, 2007 amounting to \$34,180.85, plus attorneys' fees, costs and disbursements of this action in the amount of \$15,107.69 amounting in all to \$1,005,323.17 as shown by the annexed Statement of Damages, which is justly due and owing, and no part of which has been paid

except as therein set forth.

d. Count IV – Terwin Advisors seeks judgment from Silver State for the liquidated amount of \$5,359,272.96, plus interest at 9% from September 21, 2006 amounting to \$371,330.26, plus attorneys' fees, costs and disbursements of this action in the amount of \$15,107.69 amounting in all to \$5,745,710.91 as shown by the annexed Statement of Damages, which is justly due and owing, and no part of which has been paid except as therein set forth.

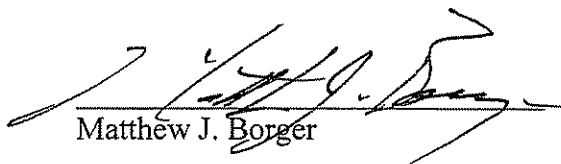
7. The disbursements sought to be taxed have been made in this action or will necessarily be made herein.

8. Defendant Michael Stoddart and Lynn Woodrum are not minors, mentally incompetent or in the military service of the United States.

WHEREFORE, plaintiffs Terwin Advisors LLC and Terwin Warehouse Management request the entry of Default and the entry of the annexed Judgment against defendants, Silver State Financial Services, Inc., Michael Stoddart and Lynn Woodrum.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: Philadelphia, Pennsylvania
July 10, 2007


Matthew J. Borger